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November 25, 2019

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, 2D
Newark, NJ 07101

RE: O'Connor v. The Dodge Company et al.
Civil Action No.: 2:16-cv-05177
Our File No. 3378G-0002

Dear Judge Dickson:

This office represents the Defendant, The Dodge Company, Inc. ("Dodge"), in the above matter. Please accept this correspondence as a joint status letter on behalf of Defendant Dodge and the Plaintiffs in the above-referenced matter in accordance with your Honor's November 13, 2019 Order.

Counsel have conferred with their respective clients, as well as each other. While we have agreed to continue to engage in settlement negotiations, the parties have also agreed to pursue resolution of the matter through private mediation, and will take steps to identify a mediator and secure a mediation date.

Pursuant to Local Rules 301.1(e)(6), as the parties have agreed to proceed with mediation and the matter can be referred out for same, all discovery proceedings are to be stayed ninety (90) days.

We thank the Court for its continued courtesies and consideration.

Respectfully submitted,
McGIVNEY, KLUGER & COOK, P.C.

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ERW

cc: All Counsel of Record

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